

EXHIBIT G

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

**IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEM PRODUCTS LIABILITY
LITIGATION**

**Master File No. 2:12-MD-02327
MDL No. 2327**

**THIS DOCUMENT RELATES TO:
WAVE I CASES**

**JOSEPH R. GOODWIN
U.S. DISTRICT JUDGE**

DECLARATION OF DANIELLE WORD

I, Danielle Word, declare as follows pursuant to 28 U.S.C. § 1746:

1.

I am a resident of the State of Texas and I have been a nurse with Dr. Anhalt's office for approximately 10 years. I suffer from no impairment or disability affecting my ability to give a truthful declaration. I have personal knowledge of the facts stated herein and know them to be true.

2.

On February 24, 2016, I was present for the entire examination of Ms. Cherise Springer performed by Dr. Anhalt. Ms. Springer's husband was also present for the entire examination.

3.

I have been told what claims Ms. Springer is making with respect to the examination. They are baseless.

4.

Dr. Anhalt was not rough, combative, argumentative, or inappropriate in any way towards Ms. Springer. To the contrary, from the outset of the examination I found her to be very

combative, disagreeable, and argumentative. It appeared that she wanted to make everything as difficult and combative as possible.

5.

Dr. Anhalt's conduct towards Ms. Springer was professional and did not differ in any way from the manner in which he treats his own patients over the 10 years I have worked with him.

6.

I was present when Dr. Anhalt asked Ms. Springer to undergo an external bladder ultrasound. Ms. Springer initially refused to allow the ultrasound. I also saw that Dr. Anhalt did not impede her in any way from contacting her counsel to discuss whether she should proceed. Ultimately, her counsel advised that she should allow us to perform the ultrasound.

7.

Again, I want to restate that I was present for the entire examination of Ms. Springer and I did not observe any inappropriate, rough, combative, or argumentative behavior from Dr. Anhalt. The only person who was combative and argumentative during the examination was Ms. Springer.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on Wednesday, March 9, 2016, in Houston, Texas.


DANIELLE WORD